

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

JONES, et al.,

Plaintiffs,

v.

Varsity Brands, LLC, et al.,

Defendants.

**Case No. 2:20-cv-02892-SHL-tmp**

**MOTION FOR ONE WEEK STAY PENDING SETTLEMENT**

Defendants hereby move the Court for a one-week stay of all proceedings. Good cause exists for such a stay because following formal mediation with the aid of an experienced mediator, Defendants accepted a monetary offer by the Plaintiffs to settle the case and the parties are trading drafts on certain non-monetary terms.

However, trial in this matter is scheduled to begin in three months, and finalizing the remaining details of a settlement is challenging in an environment where there are multiple pre-trial exchange deadlines looming, material motions pending before the Court, and additional motions and filings that are being considered by the parties. Defendants accordingly move the Court to stay all proceedings in the case (or otherwise hold such proceedings in abeyance) until April 1, 2024, by which time Defendants expect that any remaining issues will be resolved.

A one-week standstill in the proceedings will not require any adjustment to the trial schedule or other deadlines that have been so ordered by the Court.

Defendants have attempted to confer with Plaintiffs on this motion several times, but have not received a response, as described in the attached certificate of consultation.

The Defendants alternatively request a status conference to discuss these issues with the Court.

Dated: March 25, 2024

s/ Christopher Tayback

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**CERTIFICATE OF CONSULTATION UNDER LOCAL RULE 7.2(a)(1)(B)**

I hereby certify that beginning on Wednesday, March 20, counsel for various of the Defendants have called and sent emails to Plaintiffs' counsel regarding notifying the Court of the status of settlement in order to hold ongoing proceedings in abeyance while the parties work out the final written agreement memorializing their settlement. On March 22, the undersigned Defendants' counsel advised lead Plaintiffs' counsel by email that Defendants intended to file this Motion on March 25 absent a response from Plaintiffs regarding the request to notify the Court of the status of settlement. On March 23, the undersigned Defendants' counsel sent Plaintiffs' counsel a copy of this motion seeking their assent and again stating that it would be filed on March 25, absent a response. Plaintiffs' counsel has not responded with a position on the relief requested in this motion.

s/ Christopher Tayback  
Christopher Tayback